

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

**ROBERT CHARLES “CHARLIE”  
ROSEN, WILLIAM MICHAEL “MIKE”  
CROTHERS, AND  
PETER “PETE” MULDOON**

**Plaintiffs,**

**v.**

**TETON COUNTY BOARD OF COUNTY  
COMMISSIONERS, MATT CARR in his  
individual and official capacity as Teton  
County Sheriff, ERIN WEISMAN in her  
individual and official capacity as Teton  
County and Prosecuting Attorney, and  
BRETON BOMMER, DAVID HODGES,  
CLAYTON PLATT, ANDREW ROUNDY,  
CLARK ALLAN, AND RICHARD ROES,  
in their individual capacities,**

**Defendants.**

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**CASE NO. 22-CV-00028-NDF  
JURY TRIAL DEMANDED**

**PLAINTIFFS’ MOTION FOR LEAVE TO FILE NON-PUBLIC DOCUMENTS**

COME NOW Plaintiffs Robert Charles “Charlie” Rosen (“Rosen”), William Michael “Mike” Crothers (“Crothers”), and Peter “Pete” Muldoon (“Muldoon”) (together, “Plaintiffs”), by and through their attorneys, file this Motion For Leave to Non-Public Documents (“Motion”). Plaintiffs respectfully allege and show the Court as follows:

1. The Protective Order in this matter requires that any material designated as confidential by any party shall be filed with the Court under seal. ECF No. 45 at 3–4 ¶ 8. However, Local Rule 5.1(g) requires that, before filing any material under seal or as a non-public document, the party must first obtain permission from the Court.

2. Plaintiffs’ discovery deficiency letter, referenced as Exhibit B in Plaintiffs’ Response to Defendants’ Motion to Strike (ECF No. 147 at 3 ¶¶ 3–4), contains material designated

as “confidential” under this Court’s Protective Order. Therefore, Plaintiffs respectfully request leave from this Court to file the discovery deficiency letter as a non-public document, so it may be referenced as Exhibit B to Plaintiffs’ Response to Defendants’ Motion to Strike. To preserve the public’s right of access to the Court’s proceedings, Plaintiffs will submit a redacted version of the same filing the following week.

3. For these reasons, Plaintiffs respectfully request that this Court grant Plaintiffs’ Motion for Leave to File Non-Public Documents.

Dated: January 11, 2023

Respectfully submitted,

By :/s/ Dylan French

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*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document has been served on counsel of record via the Court's CM/ECF system on January 11, 2023

/s/ Dylan French

Dylan French

**CERTIFICATE OF CONFERENCE**

I certify that I conferred with Defendants' counsel via email on January 10, 2023 regarding the relief requested in Plaintiffs' Motion for Leave to File Non-Public Documents. Counsel for Defendant Matt Carr in his official capacity and counsel for Defendants Andrew Roundy, Breton Bommer, David Hodges, Clayton Platt, and Matt Carr, in his individual capacity indicated that they are not opposed to the requested relief. Counsel for Clark Allan and Erin Weisman in her individual and official capacity did not respond.